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BEFORE THE
POSTAL RATE COMMISSION

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WASHINGTON, D.C. 20268-0001 Jul 31 11 36 AM '96

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Special Services Fees and Classifications) I

Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-10-12)
(July 31, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

GAIL WILLETTE

Director

Office of the Consumer Advocate

DAVID RUDERMAN

Attorney



OCA/USPS-10. The Request in Docket No. MC96-3, at 1, refers to "changes to the rates for the classes and subclasses of mail" and to "the fees for other special services not specifically addressed by the proposals" that are "planned to be addressed in later Requests."

- a. List separately each contemplated change in the rates for classes and subclasses that is "planned to be addressed in later Requests." Describe the nature and extent of the contemplated change and a range of likely dates for the filing of each such Request.
- b. List separately each contemplated change in the fees for special services not yet "addressed" that is "planned to be addressed in later Requests." Describe the nature and extent of the contemplated change and a range of likely dates for the filing of each such Request.
- c. List separately each special service not requiring "significant reform" and state the basis for the conclusion that reform is not needed.

OCA/USPS-11. Page 3 of the Request contains the statement:
"This filing is unusual in that it would have the effect of
increasing net revenue for the Postal Service, outside of an

omnibus proceeding." Please state all policy reasons to support the conclusion that it is desirable to increase net revenue outside of an omnibus proceeding.

- OCA/USPS-12. Please refer to the statement contained in the Request at 3: "The Postal Service does not wish to maintain products which can currently be improved, while it waits until an omnibus proceeding"
- a. As this conclusion does not reasonably seem subject to dispute, what is the point to be made by the statement?

 Please explain in full.
- b. Who would be likely to insist that product improvement be restricted to omnibus proceedings? Please explain in full.
- c. Is the point of this statement that the Postal Service should be permitted to increase net revenues without waiting for an omnibus rate case? Please explain in full.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

DAVID RUDERMAN

Tail full

Attorney

Washington, D.C. 20268-0002 July 31, 1996